

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
Rules and Regulations Implementing the)	
Telephone Consumer Protection Act of 1991)	CG Docket No. 02-278
Petition of AmeriCredit Financial Services)	
Inc. d/b/a GM Financial for Waiver)	
)	
)	
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PETITION FOR WAIVER

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May 16, 2019

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PETITION FOR WAIVER

I. INTRODUCTION AND SUMMARY

In this Petition, AmeriCredit Financial Services Inc. d/b/a GM Financial (“GM Financial” or “company”) seeks a limited waiver of section 64.1200(b)(1) of the Federal Communications Commission (“FCC” or “Commission”) rules to allow it to satisfy the Telephone Consumer Protection Act’s (“TCPA’s”) Identification Requirement by providing only its “doing business as” (“DBA”) name when placing artificial or prerecorded voice calls. GM Financial offers retail financing and vehicle leases to consumers through its dealer network. GM Financial provides auto finance solutions to 14,000 dealers worldwide, and it is the assignee and servicer for millions of auto lease and finance consumers.

GM Financial respectfully requests that the Commission grant the requested limited waiver to allow it to use its authorized DBA name—GM Financial—instead of its legacy name—AmeriCredit Financial Services Inc.—when placing artificial or prerecorded voice calls. Good cause exists for the Commission to grant this relief. *First*, allowing GM Financial to use

only its DBA name when placing artificial or prerecorded voice calls will avoid customer confusion and, accordingly, will *better* serve the purposes of the TCPA’s Identification Requirement for artificial or prerecorded voice calls.¹ GM Financial’s customers are unfamiliar with the legacy AmeriCredit Financial Services Inc. name because the GM Financial name alone is used nationwide in all customer-facing communications and interactions. As a result, those customers are not likely to recognize or understand the identity of the calling party if AmeriCredit Financial Services Inc. is the name provided; however, they will recognize and understand the identity of the calling party if the GM Financial name is provided. *Second*, allowing GM Financial to use only its DBA name when placing artificial or prerecorded voice calls will not hinder consumers’ ability to search for and find GM Financial’s contact information. GM Financial is authorized by the appropriate regulatory authority in every state plus Guam, Puerto Rico, and the Virgin Islands to use the GM Financial DBA name, and as such, GM Financial consumers can access relevant contact and other corporate information using only the DBA name.² Accordingly, grant of the limited waiver is consistent with the Commission’s rules and its precedent.

¹ See *Petition for Expedited Declaratory Ruling and/or Waiver Filed by National Grid USA, Inc.*, CG Docket No. 02-278, Order, 30 FCC Rcd. 13276, ¶ 1 (Nov. 16, 2015) (“*National Grid Order*”) (“We conclude that granting this limited waiver will better serve the public interest by ensuring that National Grid’s customers understand the identity of the calling party and are not confused by the use in prerecorded messages of unfamiliar legacy utility names.”).

² See *id.* (explaining that limiting the waiver to the use of the registered DBA name “affords . . . customers a reasonable opportunity to search for and find the contact information for the calling party”).

II. THE COMMISSION’S TELEPHONE CONSUMER PROTECTION ACT RULES REQUIRE A CALLING PARTY TO IDENTIFY ITS BUSINESS NAME TO THE CALLED PARTY.

Under the Commission’s TCPA rules, Section 64.1200(b)(1) sets forth the “Identification Requirement” for artificial or prerecorded voice calls. Specifically, this section requires that:

[a]ll artificial or prerecorded voice telephone messages shall . . . [a]t the beginning of the message, state clearly the *identity of the business*, individual, or other entity that is responsible for initiating the call. *If a business is responsible for initiating the call, the name under which the entity is registered to conduct business with the State Corporation Commission (or comparable regulatory authority) must be stated.*³

The Commission has clarified that “[w]ith respect to the caller’s name, the prerecorded message must contain, at a minimum, the *legal name* under which the business, individual or entity calling is registered to operate.”⁴ In the Commission’s view, “adequate identification information is vital so that consumers can determine the purpose of the call, possibly make a do-not-call request, and monitor compliance with TCPA rules.”⁵

Recognizing that businesses can have DBA names, the Commission has also clarified that its requirement “does not prohibit the use of such [DBA names], provided the legal name of the business is also stated.”⁶ However, the Commission previously granted a limited waiver of this rule for National Grid to use *only* its registered DBA name to satisfy this requirement.⁷

³ 47 C.F.R. § 64.1200(b)(1) (emphasis added).

⁴ See *Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Report and Order, 18 FCC Rcd. 14014, ¶ 144 (July 3, 2003) (“*2003 TCPA Order*”) (emphasis added). In every state plus Guam, Puerto Rico, and the Virgin Islands, GM Financial is (1) authorized to do business in its DBA name and (2) searchable at the state-level by its DBA name.

⁵ *Id.*

⁶ *Id.*

⁷ *National Grid Order* ¶ 10 (“We conclude that National Grid’s petition meets the standard for granting a limited waiver of section 64.1200(b)(1), and that such waiver would not undermine the policy objectives of that rule.”).

III. GOOD CAUSE EXISTS TO GRANT THE REQUESTED LIMITED WAIVER FOR GM FINANCIAL TO USE ONLY ITS DBA NAME TO SATISFY THE COMMISSION’S IDENTIFICATION REQUIREMENT FOR ARTIFICIAL OR PRERECORDED VOICE CALLS UNDER THE TELEPHONE CONSUMER PROTECTION ACT.

A. The Commission Has Broad Discretion To Waive Its Rules When Special Circumstances Warrant a Deviation from the General Rule and Such a Deviation Would Better Serve the Public Interest.

Section 1.3 of the Commission’s rules allows the Commission to waive its rules, in whole or in part, for “good cause shown.”⁸ “A waiver may be granted if: (1) the waiver would better serve the public interest than would application of the rule; and (2) special circumstances warrant a deviation from the general rule.”⁹ As the FCC has explained, “[t]he Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.”¹⁰ Further, “the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.”¹¹

⁸ 47 C.F.R. § 1.3 (“The provisions of this chapter may be suspended, revoked, amended, or waived for good cause shown, in whole or in part, at any time by the Commission, subject to the provisions of the Administrative Procedure Act and the provisions of this chapter. Any provision of the rules may be waived by the Commission on its own motion or on petition if good cause therefor is shown.”).

⁹ *National Grid Order* ¶ 9 (citing *Ne. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990)).

¹⁰ *In the Matter of Rural Health Care Support Mechanism*, WC Docket No. 02-60, *Order*, 32 FCC Rcd 5065, ¶ 3 (June 23, 2017) (citation omitted).

¹¹ *Id.* (citation omitted); *see also Allband Communications Cooperative, Petition for Waiver of Sections 69.2(hh) and 69.601 of the Commission’s Rules*, WC Docket No. 05-174, *Order*, 20 FCC Rcd 13566, ¶ 5 (Aug. 11, 2005). The D.C. Circuit has recognized the Commission’s discretion to waive its rules and has noted that the agency’s waiver determinations are entitled to heightened deference. *See AT&T Wireless Servs., Inc. v. FCC*, 270 F.3d 959, 965 (D.C. Cir. 2001) (explaining that the Commission may grant a waiver where there are “unique” circumstances and “significant public” interest benefits); *Office of Comm’n of United Church of Christ v. FCC*, 911 F.2d 803, 812 (D.C. Cir. 1990) (“Given the deference due the agency in matters of this sort, we see no basis for finding that the Commission’s waiver of the [rule at issue] was arbitrary or capricious.”); *City of Angels Broad., Inc. v. FCC*, 745 F.2d 656, 663 (D.C. Cir. 1984) (“The scope of our review of [a waiver] determination is narrow and contained.”);

“Generally, the Commission may grant a waiver of its own rules if the relief requested would not undermine the policy objectives of the rule in question, and would otherwise serve the public interest.”¹²

The Commission has previously applied these standards to conclude that, under the facts described in a request by National Grid for waiver of the TCPA’s Identification Requirement, the goals of that requirement would be better served by permitting use of National Grid’s DBA name alone.¹³ The facts set forth in the instant Petition are at least as compelling as those presented by National Grid, and it is settled that disparate treatment of similarly situated parties violates the Administrative Procedure Act.¹⁴

B. Although Consumers Know the Company as GM Financial, the Company’s Legacy Name is AmeriCredit Financial Services Inc.

GM Financial is the DBA name that is used nationwide and that all of GM Financial’s customers recognize. AmeriCredit Financial Services Inc. began operating in September 1992 in Fort Worth, Texas and operated in that name until October 1, 2010, when the parent company of AmeriCredit Financial Services Inc. was acquired by General Motors Company and acquired the trade name to become AmeriCredit Financial Services Inc. d/b/a GM Financial. Because the company started business as AmeriCredit Financial Services Inc., the majority of its financial services licenses are registered under the legacy name. These licenses are state-based and varied,

WAIT Radio v. FCC, 418 F.2d 1153, 1157, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972) (“The agency’s discretion to proceed in difficult areas through general rules is intimately linked to the existence of a safety valve procedure for consideration of an application for exemption based on special circumstances.”).

¹² *National Grid Order* ¶ 9 (citing *Ne. Cellular*, 897 F.2d at 1157).

¹³ *Id.* ¶ 10.

¹⁴ See, e.g., *Indep. Petroleum Ass’n v. Babbitt*, 92 F.3d 1248, 1260 (D.C. Cir. 1996); *McElroy Elec. Corp. v. FCC*, 990 F.2d 1351, 1365 (D.C. Cir. 1993); *Melody Music v. FCC*, 345 F.2d 730, 732-33 (D.C. Cir. 1965).

and include motor vehicle sales finance licenses, lender licenses, sales finance licenses, money lending licenses, and consumer loan licenses. In fact, the company holds 809 state financial services licenses, and an additional 47 state insurance licenses. It would not be practical to amend each and every one of those state licenses to update the legacy name to GM Financial. In many jurisdictions a name change is considered a change in control and requires an application for a wholly new license and, in any event, an attempt to change the names on more than 850 licenses would be a burdensome and costly administrative and legal task.

C. Allowing GM Financial To Use Only Its DBA Name To Satisfy the Identification Requirement Will Better Serve the Public Interest and Is Consistent with the Policy Objectives of the Commission’s Identification Requirement.

GM Financial places artificial or prerecorded voice calls to its customers for a variety of reasons, including to convey important information about the customer’s GM Financial account. Pursuant to the requested waiver, GM Financial wishes to satisfy the Identification Requirement, with respect to these calls, by using only the name “GM Financial” rather than “AmeriCredit Financial Services Inc. d/b/a GM Financial.”

There is good cause for the Commission to grant this request. *First*, using the GM Financial name alone when placing artificial or prerecorded voice calls will avoid consumer confusion. GM Financial is the name that customers are familiar with and is the name used on all customer-facing communications and interactions. For example, GM Financial is the name used on the website—gmfinancial.com.¹⁵ All customer facing documents—such as the Online Privacy Policy—use the DBA name GM Financial.¹⁶

¹⁵ See Exhibit A. The first website in Exhibit A is the current gmfinancial.com website, and the second is the new gmfinancial.com website which is in beta testing mode.

¹⁶ See Exhibit B.

Additionally, customers see the GM Financial name and branding over the life of their GM Financial account, beginning when the account is assigned to GM Financial by an auto dealer (which occurs shortly after a customer purchases or leases a vehicle). Indeed, for customers who choose to fill out an application from the GM Financial website, the Online Credit Application (“OCA”) uses the GM Financial name and branding.¹⁷ The Welcome Letter for new customers is from GM Financial and contains the GM Financial branding—the envelope and the letter clearly show that the sender is GM Financial.¹⁸ Customers can create online accounts to manage their GM Financial account and other services provided by the company. The entirety of the online account interface, including the login page and the MyAccount Dashboard, uses the GM Financial name and branding.¹⁹ Likewise, GM Financial offers customers a mobile app, which uses the GM Financial name and branding.²⁰ GM Financial’s entire social media presence uses the GM Financial name and branding.²¹ The billing statement and accompanying envelope that customers see are from GM Financial and use the GM Financial name and branding.²² Finally, all email communications with customers—which can include newsletters, emails promoting new GM Financial tools and products (e.g., the mobile app), or emails providing customers with information about their specific account or lease—are from GM Financial and contain the GM Financial name and branding.²³

¹⁷ See Exhibit C.

¹⁸ See Exhibit D.

¹⁹ See Exhibit E.

²⁰ See Exhibit F.

²¹ See Exhibit G.

²² See Exhibit H.

²³ See Exhibit I. If the GM Financial customer also has a GM manufactured vehicle, he or she may see the corresponding GM Brand logo for their respective vehicle (Chevrolet, Cadillac,

At the same time, customers are unfamiliar with the AmeriCredit Financial Services Inc. name. Indeed, customers may see AmeriCredit Financial Services Inc.'s name, at most, once in a customer communication during their relationship with GM Financial. The Welcome Letter that is sent at the inception of a loan indicates in fine print that GM Financial is the tradename of AmeriCredit Financial Services Inc.²⁴ This reference to the legacy name is likely the first and last time that a customer ever will encounter that name, even assuming that an ordinary customer would focus on a fine print reference at that time.

Accordingly, GM Financial's continued use of the legacy AmeriCredit Financial Services Inc. name to satisfy the Identification Requirement may risk confusion on the part of the called party. Confusion in this scenario may be particularly detrimental, as it could lead to a consumer failing to receive important information and notices regarding their account, including communications related to payments that may have been missed or returned. Continuing confusion also risks prolonged delinquency because the consumer does not contact GM Financial to discuss potential financial assistance options that may be available. That lack of contact could result in a negative impact on the consumer's credit bureau reports or even repossession of the vehicle. Moreover, allowing GM Financial to use only the name that consumers are familiar with and not confused by will help to satisfy one of the policy rationales behind the Identification Requirement: to allow the consumer to "determine the purpose of the call."²⁵

Buick or GMC) on correspondence in addition to the GM Financial logo for billing statements, MyAccount Dashboard, or Mobile App, but will not see an AmeriCredit brand, name, or logo.

²⁴ See Exhibit D. In addition, the gmfinancial.com website contains, in the bottom righthand corner, a link entitled "AmeriCredit Dealer." See Exhibit A. This link directs to a webpage for dealers, rather than customers.

²⁵ See 2003 TCPA Order ¶ 144.

Second, using only the GM Financial DBA name to satisfy the Identification Requirement will still afford called parties a reasonable opportunity to search for and find the company's contact information. GM Financial is the authorized DBA name in all fifty states, plus Guam, Puerto Rico, and the U.S. Virgin Islands. Accordingly, using GM Financial, consumers can search for and access relevant contact and other corporate information.²⁶ Grant of the requested relief would also be consistent with another policy rationale of the Identification Requirement: to provide "adequate identification information . . . [so that the consumer can] possibly make a do-not-call request, and monitor compliance with TCPA rules."²⁷

IV. CONCLUSION

For the foregoing reasons, GM Financial respectfully requests that the Commission grant the requested limited waiver, and permit it to satisfy the Identification Requirement using the GM Financial name standing alone.

Respectfully submitted,

/s/ Eve K. Reed

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²⁶ See *National Grid Order* ¶ 12.

²⁷ See *2003 TCPA Order* ¶ 144.

Exhibit A: Website — GMFinancial.com homepage



Download GM Financial Mobile: Our app provides convenient, secure access anytime, anywhere. Available now for iOS and Android.

MYACCOUNT

Make a payment.
Set up automatic payments.
Manage your account.

☒ Remember My User ID

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Our secure online credit application can help save time at the dealership.

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Payment Details

Learn about the ways to make a payment and where you can send it.



New Customers

Learn about first steps and registering for MyAccount.



Payoff Answers

Find out how to obtain a payoff on your vehicle.



Find the Answers

Find answers to our most frequently asked questions.

LEASE VS. BUY

We can help you figure out which financing option might be your best fit.

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AFFORDABILITY CALCULATOR

Test drive the numbers and know before you choose your next vehicle.

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APPLY FOR FINANCING

Get pre-qualified before heading into the dealership with our online credit application.

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EARN TOWARD A NEW GM VEHICLE WITH EVERY PURCHASE

5% Earnings on first \$5,000 spent each year
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No annual fee and no Earnings expiration

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OTHER RESOURCES

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Make a Payment

Log in to MyAccount to make payments and manage your account.

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Earn toward a new GM vehicle with every purchase.

- 5% Earnings on first \$5,000 spent each year
- 2% unlimited Earnings after that
- No annual fee and no Earnings expiration on an open account

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Dealer Locator

Find a GM dealership near you.

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Car Shopping

Make your vehicle search easier than ever.

[SHOP](#)



Apply For Credit

Save time with prequalified financing.

[APPLY NOW](#)



Exhibit B: Online Privacy Policy

GM Financial is committed to respecting and protecting customer privacy. The Online Privacy Policy ("Privacy Policy") explains what information GM Financial may collect about you when you use the GM Financial website, https://www.gmfinancial.com, or mobile application (collectively, "Site") or the products or services offered through the Site ("Services") and how we use and protect that information. Please read the Privacy Policy carefully. By using the Site or the Services, you consent to the collection and use of your personal information as described in the Privacy Policy. If you do not agree with the terms of the Privacy Policy, please do not use the Site or Services.

The Site is controlled, operated, and administered by GM Financial from its offices within the United States. If you are accessing the Site from a location outside the United States, you acknowledge and consent to the collection, storage, processing, and transfer of your personal information to our facilities in the United States and to those third-parties with whom we share it as described in this Statement.

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Collecting Personal Information

GM Financial may collect, store, and use the following kinds of personal information: information you provide to us when you register on MyAccount, including your first and last names, GM Financial account number, Social Security number, e-mail address, and vehicle information such as make, model, and vehicle identification number ("VIN"); information you provide when completing an online GM Financial credit application, including your first and last names, physical address, residence type, length of time at current address, monthly rent or mortgage amount, home and business telephone numbers, e-mail address, date of birth, Social Security number, employment status, job title, employer name, employer phone number, length of time at place of employment, and income information;

information from commercially available third-party sources, such as consumer reporting agencies and identity verification services, which may be combined with the information you provide when completing an online GM Financial credit application; information about the device or computer you use to access the Site, including device ID, device and platform type, operating system, IP address, browser type and version, domain name, and referring website/service/application; and information that you send directly to GM Financial or post to any of GM Financial's social media websites for publication on the Internet, such as your first and last names, user name, profile picture, user preferences such as "Like" button clicks, and the content of your posts.

For any other legitimate business purpose.

You may use personal information that we collect in the following ways:

- To provide you with Services and to fulfill our contractual obligations to you;
- To process your GM Financial online credit application;
- To communicate with you about the Site or Services, such as to send you account updates or other communications regarding your account or to inform you of any changes to the Site or Services;
- To send you information about promotions or other marketing material;
- To spend on purposes for which you provide consent;
- To provide product support or other services you request, for example technical support or to answer questions about the Site;
- To maintain and improve the Site and Services and improve user experience; and

Using Personal Information

We may use personal information that we collect in the following ways:

- To provide you with Services and to fulfill our contractual obligations to you;
- To process your GM Financial online credit application;
- To communicate with you about the Site or Services, such as to send you account updates or other communications regarding your account or to inform you of any changes to the Site or Services;
- To send you information about promotions or other marketing material;
- To spend on purposes for which you provide consent;
- To provide product support or other services you request, for example technical support or to answer questions about the Site;
- To maintain and improve the Site and Services and improve user experience; and
- For any other legitimate business purpose.

Third-Party Collection of Personal Information

GM Financial may allow third-party service providers to place persistent identifiers such as cookies, pixel tags, and web beacons on the Site.

Analytical Purposes: We use cookies and web beacons to analyze user activity in order to improve the Site. For example, we use this information to determine the number of visitors to the Site, the pages viewed per visit, and the time spent on particular pages. Collecting this information helps us provide you with a better online experience.

User Preferences: We may use cookies, pixel tags, and web beacons to store preferences you demonstrate on the Site. For instance, we may use a cookie to store your User ID so that you do not need to re-enter it every time you visit MyAccount.

Marketing: We may use cookies and web beacons from third-party service providers for marketing purposes to place GM Financial advertisements on non-affiliated websites. We may also use service providers who use tracking devices such as cookies, pixel tags, and web beacons to collect anonymized information about consumers' activities on non-affiliated websites. The information they collect typically includes things like browser type, IP address, pages visited, and time visited. GM Financial may use this information to provide relevant marketing content to you. You may opt out of receiving such advertisements on the advertisement itself. You may be able to opt out of some third party service providers' use of cookies by visiting the Network Advertising Initiative opt-out page or the Digital Advertising Alliance's Opt-Out page.

One of the third-party services that we use is Google Analytics, which is a web analysis service provided by Google. Google utilizes the data collected to track and examine the use of the Site and may share this data with other Google services. We also use the Google AdWords remarketing service to advertise on third-party websites. Google may show GM Financial advertisements on websites across the Internet and may use cookies to serve advertisements based on your past visits to the Site. You can find information about how to opt out of Google's use of cookies by visiting Google's Ads Settings.

The Site may also include social media features, such as the Facebook "Like" button, and other widgets, such as the "Share" button or interactive mini-programs provided by third-parties. These third-parties may use cookies or other tracking technologies to collect information about you when you use the Site. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services.

Disclosing Personal Information to Third-Parties

We may disclose personal information we collect from you to the following third-parties, for the purposes specified:

- Service Providers.** We may use third-parties to provide you with products and services you request. If you are a customer, we may disclose the information we collect about you as described herein and in accordance with GM Financial customer privacy notices and applicable law.
- Affiliates.** For customers, we may share personal information within the General Motors family of companies for analytical purposes, user preferences, and marketing in accordance with GM Financial's customer privacy notices and applicable law.
- Dealers.** We may share your credit application information with the dealer you select during the credit application process, in accordance with the terms and conditions of that process and applicable law.
- Change in Corporate Structure.** We may share information in connection with a merger, acquisition, consolidation, change of control, or sale of all or a portion of our assets or if we undergo bankruptcy or liquidation.
- Consumer Reporting Agencies.** We may report the status of your account with us to consumer reporting agencies.
- Other Disclosures.** We may also disclose your personal information when we are required to do so by law, with your consent, or when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or legal process.

Making Changes to Your Information

You may make changes to the information that you provide to us on the MyAccount Site by logging into MyAccount and selecting "My Profile." You may also select the "Contact Us" tab on the Site to ask us any questions.

Do Not Track

Certain web browsers may provide an option by which you can have the browser inform websites, or Internet services you visit that you do not wish to have your activities tracked by cookies or other persistent identifiers across time and across third-party Internet websites, online or cloud computing services, online applications, or mobile applications. These are commonly called "Do Not Track" signals. At this time, the Site does not honor Do Not Track signals from web browsers because it may diminish the optimal performance of the Site. However, you may refuse or delete cookies. Please refer to your browser's Help instructions to learn more about cookies and other technologies, and how to manage their use. If you do elect to refuse or delete cookies, you will need to repeat this process if you use another computer or change browsers. If you choose to decline cookies, some of the functionalities of websites may be impaired.

Security

We maintain reasonable physical, electronic, and procedural safeguards designed to protect against loss or unauthorized access, disclosure, alteration, or destruction of the information you provide on the Site. However, no method of transmission over the Internet or electronic storage technology is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. The security of your information also depends on the security of the electronic devices and Internet Service Provider network that you use to access the Site. We are not responsible for the security of your information accessed on those devices or networks.

Mobile Application

We may offer you the ability to access your GM Financial account on your mobile devices via the GM Financial My Account Mobile Application ("My Account App"). When you use the My Account App, we may collect information described in the section above, titled Collecting Personal Information. We may also collect information about your mobile device, device settings, screen resolution, information about your location, and analytical information about how you use your mobile device. Some mobile devices may allow you to limit the sharing of personal information collected by applications that run on those devices, or information collected by the devices themselves. We may ask permission before collecting certain information (such as precise geolocation information) through the My Account App.

For your convenience, you may be able to use biometric authentication (using Touch ID, Fingerprint, or Face ID) provided through your mobile device manufacturer to access your GM Financial account. (Please refer to your mobile device manufacturer's product information for details on biometric functionality for your device.) To enable biometric authentication for logging into the My Account App, you are required to save your GM Financial user name and password on your device. GM Financial does not control the fingerprint, touch ID or Face ID functionality. GM Financial does not have access to your fingerprint(s) or facial recognition information. You understand and agree that any fingerprint or facial recognition information stored on this device can be used to access your GM Financial customer account information. We recommend that you employ a strong device password as an additional layer of security.

Children's Privacy

The Site is not intended for use by children under the age of 13 years, and we do not knowingly collect personal information from children under the age of 13 years. Please contact us if you believe we may have unknowingly collected information about a child under 13, and we will take immediate steps to delete any such personal information.

Changes to the Privacy Policy

We may modify this Privacy Policy at any time. If we do, we will post the revised version on this page. You should periodically check here for the most up-to-date version of this Privacy Policy. Any changes to the Privacy Policy will not be retroactively applied and will not alter how we handle any personal information we previously collected from you.

Effective Date

This Privacy Policy is effective as of April 12, 2018.



GM FINANCIAL

Exhibit C: Online Credit Application



Powered by

GM

 GM FINANCIAL

Thank you for considering GM Financial. The dealership you select in your application will have all of your information and can answer any questions about the vehicle buying process.

VEHICLE/PURCHASE INFORMATION

Please indicate your preferred vehicle. Your final vehicle selection will occur when you visit your selected dealership.

Vehicle Type	Year	Brand	Model	Trim
<div>NEW</div>				

PERSONAL INFORMATION

Email Address		
Please Re-Enter the Email Address		
First Name	Last Name	Suffix

RESIDENTIAL INFORMATION

Street Address		
City	State	ZIP Code
Residence Type	Time at Address	

EMPLOYMENT INFORMATION

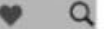
Employment Status	Job Title
Employer Name	Employer Phone
	555-555-5555
Length of Time	Gross Annual Income*



CHEVY 21

HOURS & MAP CONTACT US BOOK APPT

HOME NEW VEHICLES CERTIFIED PRE-OWNED USED VEHICLES SPECIALS SERVICE MORE



GET FINANCING. BUY WITH CONFIDENCE. DRIVE.



GM FINANCIAL

APPLY FOR CREDIT BELOW, THEN VISIT THE DEALERSHIP AND CHOOSE YOUR NEXT VEHICLE WITH CONFIDENCE.

* = required

VEHICLE/PURCHASE INFORMATION

Vehicle Type *	Brand *	Model *	Year *	Trim
Choose Vehicle Type				

PERSONAL INFORMATION

Email Address *

Please Re-Enter the Email Address *

First Name *	Last Name *	Suffix

Phone Number *	Date Of Birth *

Social Security Number *

Please Re-Enter the Social Security Number *

Co-Applicant

☐ ADD CO-APPLICANT

RESIDENTIAL INFORMATION

Street Address *

City *	State *	ZIP Code *
	PA	

Residence Type *	Time at Address *

Monthly Rent/Mortgage Amount *

EMPLOYMENT INFORMATION

Employment Status *	Job Title *

Employer Name *	Employer Phone *

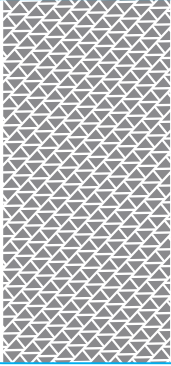
Length Of Time *	Gross Annual Income *

I certify that I have provided true and accurate information in this form. By submitting this form, I authorize the dealer to begin a credit investigation, to process my application, and to forward my application to lenders, financial institutions, or other third parties in order to process my application.

SUBMIT

Exhibit D: Welcome Letter

Visit gmfinancial.com to manage your account 24/7.



Single Window: 2 5/8" x 4 5/8"
From Left: 1/2"
From Bottom: 2 3/4"

ADDRESS SERVICE REQUESTED

PRSRT
FIRST-CLASS MAIL
U.S. POSTAGE PAID
NCP

Welcome to the family.

Important information about
your new account.



GM FINANCIAL

P.O. BOX 183834,
ARLINGTON, TX 76096-3834

FIRSTNAME LASTNAME
ADDRESS LINE 1
MANSFIELD, TX 76063-0000

CONGRATULATIONS ON YOUR PURCHASE!

Important information about your
new GM Financial account.

January 19, 2018

Dear FIRSTNAME LASTNAME,

Congratulations on the recent purchase of your vehicle from Dealer Full Name. We would like to welcome you as our customer and thank you for choosing to do business with the GM family of dealerships. You've made the right choice!

Earning your trust and satisfaction by providing you with unmatched service is our priority. Throughout the life of your contract you can expect reliable, friendly and exceptional service from us - online or on the phone. Our representatives are specially trained to answer your questions and assist with your account.

Managing your GM Financial account

- **Access your account 24/7.** Visit www.gmfinancial.com and register for online access to MyAccount. After creating a user ID and password, you'll have access around-the-clock to sign up for payment reminders, update your contact information, get a payoff quote, make a payment, and more.
- **Choose your payment option.** You have many choices when it comes to making your payment on time, whether it's online, by mail or by phone. We also offer an Automatic Payment Plan so you'll never have to remember when your payment is due - it's automatically deducted from your bank account. *All of our payment options are listed on the back of this letter.*
- **Speak with our friendly representatives.** For quick access to essential account information including balances, payment histories, or to make a payment, simply call 877-203-5517.

Enjoy peace of mind with extended protection coverage

GM Financial is committed to providing the best vehicle experience in the industry, even after the factory warranties have ended. Your dealership may still be able to offer you extended protection for your new JEEP GRAND CHEROKEE. With additional coverage, you'll have the safety, security and peace of mind that comes with every bump in the road. For more information, contact Dealer Full Name.

GM Financial promises to provide you with customer service you can count on. We are available to answer your questions and provide you with the account expertise you expect. All of us at GM Financial look forward to servicing your account needs now and in the future.

Sincerely,

GM Financial
Customer Service

If you have any questions about your GM Financial account, call Customer Service toll free at 877-203-5517 or visit us online at www.gmfinancial.com.

About Your Privacy

Your privacy is important to us and GM Financial takes every precaution to make sure it is protected. Enclosed for your records is a copy of the GM Financial privacy policy applicable to GM Financial family of companies.

YOUR ACCOUNT AT A GLANCE

Account Number:

Vehicle:

2017 JEEP GRAND
CHEROKEE

VIN:

Amount Financed:

Annual Percentage Rate:

4.49%

Length of Term:

72

Monthly Payment:

First Payment Due:

June 5, 2017

Final Payment Due:

May 5, 2023

Customer Service

877-203-5517

*TTY Hearing Impaired
1-888-998-0253*

Monday - Thursday

7 a.m. - 8 p.m. CT

Friday

7 a.m. - 7 p.m. CT









Automated System

24/7

*Please have your
Account Number
or Social Security Number
available
when you call.*

Important Information: to ensure that your payments will arrive on time, mail them 7-10 days before the due date. If you have not received a billing statement in time for you to meet your due date, please mail your check, money order or cashier's check made payable to GM Financial along with your account number to: GM Financial PO Box 78143 Phoenix, AZ 85062-8143

U.S. Customer Payment Options

PAYMENT OPTION	DELIVERY METHOD	COST
 Pay Online	Visit gmfinancial.com and set up your personalized MyAccount	Western Union service fees may apply
 Pay Automatically	Complete Authorization Agreement for Automatic Payment Plan available at www.gmfinancial.com OR Contact Customer Service for assistance 877-203-5517	No Fee
 Pay by Regular Mail	GM Financial PO Box 78143 Phoenix AZ 85062-8143	Postage
 Pay by Overnight Mail	GM Financial 1820 E. Sky Harbor Circle South, Suite 150 Phoenix, AZ 85034-9700	Postage
 Pay by Phone - Agent	Contact Customer Service agent 877-203-5517	Western Union service fees may apply
 Pay by Phone - Automated Service	Call 1-866-894-6568	Western Union service fees may apply
 Pay by Money Gram	Money Gram locations Use Receive Code 2583	Money Gram service fees may apply
 Western Union Payments	Western Union locations	Western Union service fees may apply and are dependent upon the amount of the payment and the delivery speed.

Payment options and associated costs are subject to change.

Canadian Customer Payment Options

PAYMENT OPTION	DELIVERY METHOD	COST
 Pay Automatically	Complete Authorization Agreement for Pre-Authorized Debit Plan available at www.gmfinancial.ca OR Contact Customer Service for assistance 877-203-5517	No Fee
 Pay by Regular Mail	GM Financial PO Box 4294, Postal Station A Toronto ON M5W5X7	Postage
 Pay by Overnight Mail	GM Financial Attn: Payment Services 4001 Embarcadero Drive Arlington, TX 76014	Postage
 Pay by Money Gram	Money Gram Locations Use Receive Code 11378 (Same Day) or 10489 (Next Day)	Money Gram service fees may apply
 Western Union Payments	Western Union Locations	Western Union service fees may apply

Payment options and associated costs are subject to change. Online bill payment is only available for U.S. accounts.

GENERAL INFORMATION: If you have purchased Credit Insurance and/or Guaranteed Automobile Protection coverage in connection with the above-stated contract, please be advised that if you pay the contract in full before the end of the term for which it was written, you might be entitled to a refund or credit for premiums paid. To obtain your refund, you must contact the dealership where the vehicle was purchased.

As required by state law, you are hereby notified that a negative credit report reflecting on your credit records may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. **Federal Notice: We may report information about your account to credit bureaus. Late payments, missed payments, or other defaults on your account may be reflected in your credit report.**

Understanding Simple Interest

Your GM Financial retail installment contract is a simple interest contract. Please take a moment to review this important information about simple interest.

What is simple interest?

Simple interest is an interest accrual method. Interest accrues on a daily basis on the unpaid principal balance. The interest charge is always based on the principal balance, so interest on interest is not charged.

Why is it important to understand simple interest?

The first page of your contract reflects a payment schedule, including the number and amount of the required installment payments. It is important for you to understand that your payment pattern can affect the amount you will owe at the end of the contract. If you consistently make your payments early, the final installment payment may be less than the amount reflected on the contract. However, if your payments are consistently late, additional interest and late charges may result in a final installment payment greater than the amount reflected on the contract. To avoid a larger than expected final installment, we encourage you to make timely payments in accordance with the payment schedule reflected on your contract.

How does simple interest apply to my account?

As you make the required installment payments each month, the payments will be applied first to any interest that has accrued on the unpaid principal balance, then to the principal amount due for the month being paid, and finally to other fees, as applicable.

If monthly payments are made every month on the due date as detailed on the contract, the final payment due at maturity will be the same as the monthly installment listed on the contract.

If monthly payments are made prior to the scheduled due date, less interest accrues on the unpaid principal balance. When the monthly installment is paid, the principal balance will reduce at a faster rate, therefore the final principal payment can be less than the scheduled payment amount that is listed on your contract.

If monthly payments are made after the scheduled due date, more interest accrues and the principal balance will reduce at a slower rate because the interest that has accrued is always paid first.

We look forward to serving you in the future and if you would like to discuss simple interest in greater detail, feel free to contact our **Customer Service Department at 877-203-5517. For TTY hearing impaired accessibility, please contact us at 888-998-0253.**

For additional information about simple interest visit www.gmfinancial.com or contact Customer Service.

GM Financial Customer Service Hours of Operation:

Monday – Thursday: 7:00 AM – 8:00 PM CT

Friday: 7:00 AM – 7:00 PM CT

Save this information for your records.

Exhibit E: Website — Dashboard and Logout



2017
CADILLAC XT5

Amount Due ⓘ



Due on Feb. 1, 2019

MAKE A PAYMENT

SET UP AUTO PAY

If the vehicle has been returned, please call 1-866-631-0132 for account information.

Updated as of Jan. 1, 2019

[OTHER PAYMENT OPTIONS](#)

PAYMENT PROGRESS



19 of 39
Payments to go



Monthly payment

Jul. 21, 2020
Maturity date

LAST PAYMENT

[PAYMENT HISTORY](#)

✓ Dec. 10, 2018

STATEMENTS

[GO PAPERLESS](#)

Select Statement
December 2018

VIEW

VEHICLE ACCOUNT DETAILS

Account number

Account opened

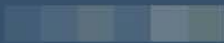
Vehicle ID number

39 months
Lease term

39,000 miles
Contract Miles

YOUR DEALERSHIP

[SCHEDULE SERVICE](#)



LEAVE PAPER IN THE PAST

Enroll in paperless billing to view your statement online.

SET UP PAPERLESS

[Visit Chevrolet.com](#)
[Visit Buick.com](#)



[About](#)
[Careers](#)
[Investor Center](#)
[Español](#)

[GM Financial Dealer](#)
[AmeriCredit Dealer](#)
[GMFinancial.ca](#)



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LOG OUT

Thank you for visiting gmfinancial.com. You have been successfully logged out of MyAccount.

IMPORTANT

If you are on a public computer, please close your browser window or tab now to keep your account information private and secure.

To log in again, [return to the Log In page](#)



DOWNLOAD GM FINANCIAL MOBILE

Our app provides convenient, secure access anytime, anywhere.

*Available now for Android. iOS version coming soon.

[LEARN MORE](#)

Exhibit F: Mobile App

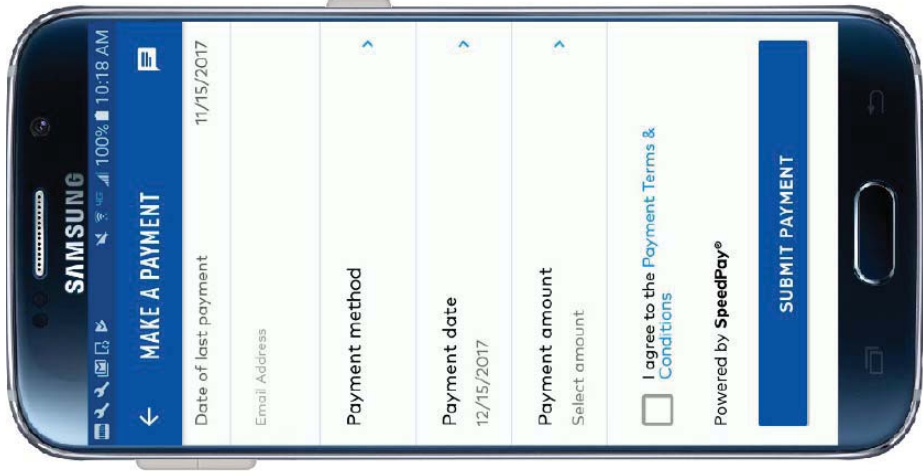
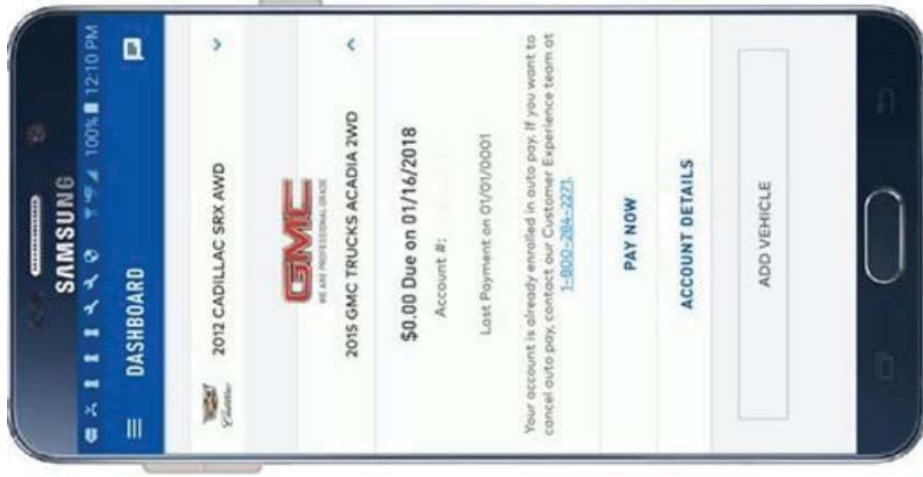
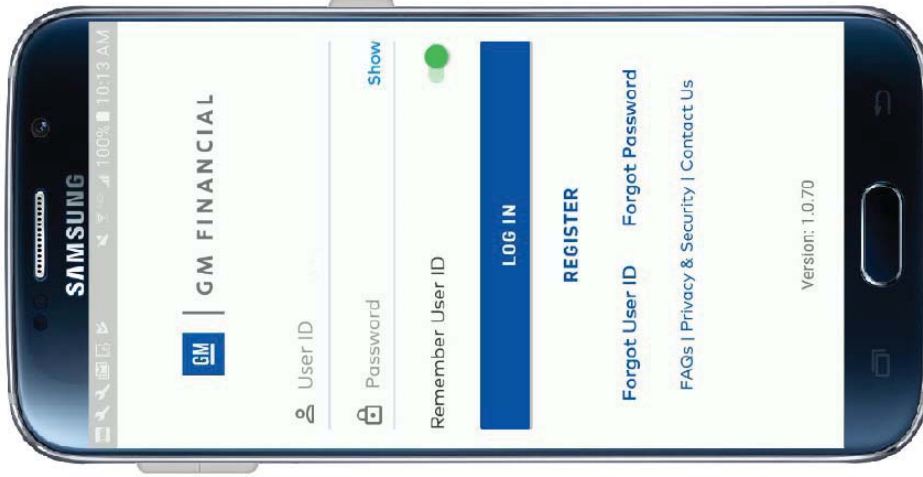


Exhibit G: Social Media



Search



GM Financial



April 23 at 9:08 AM · 🌐

GM Financial Mobile for Android devices has arrived! Manage your accounts, make payments and message our Customer Experience team — all from your mobile device! (iOS App coming soon.)



[GMFINANCIAL.COM/MOBILE](https://gmfinancial.com/mobile)

Get GM Financial Mobile Today!

Click to get started.

Download



Like



Comment



Share

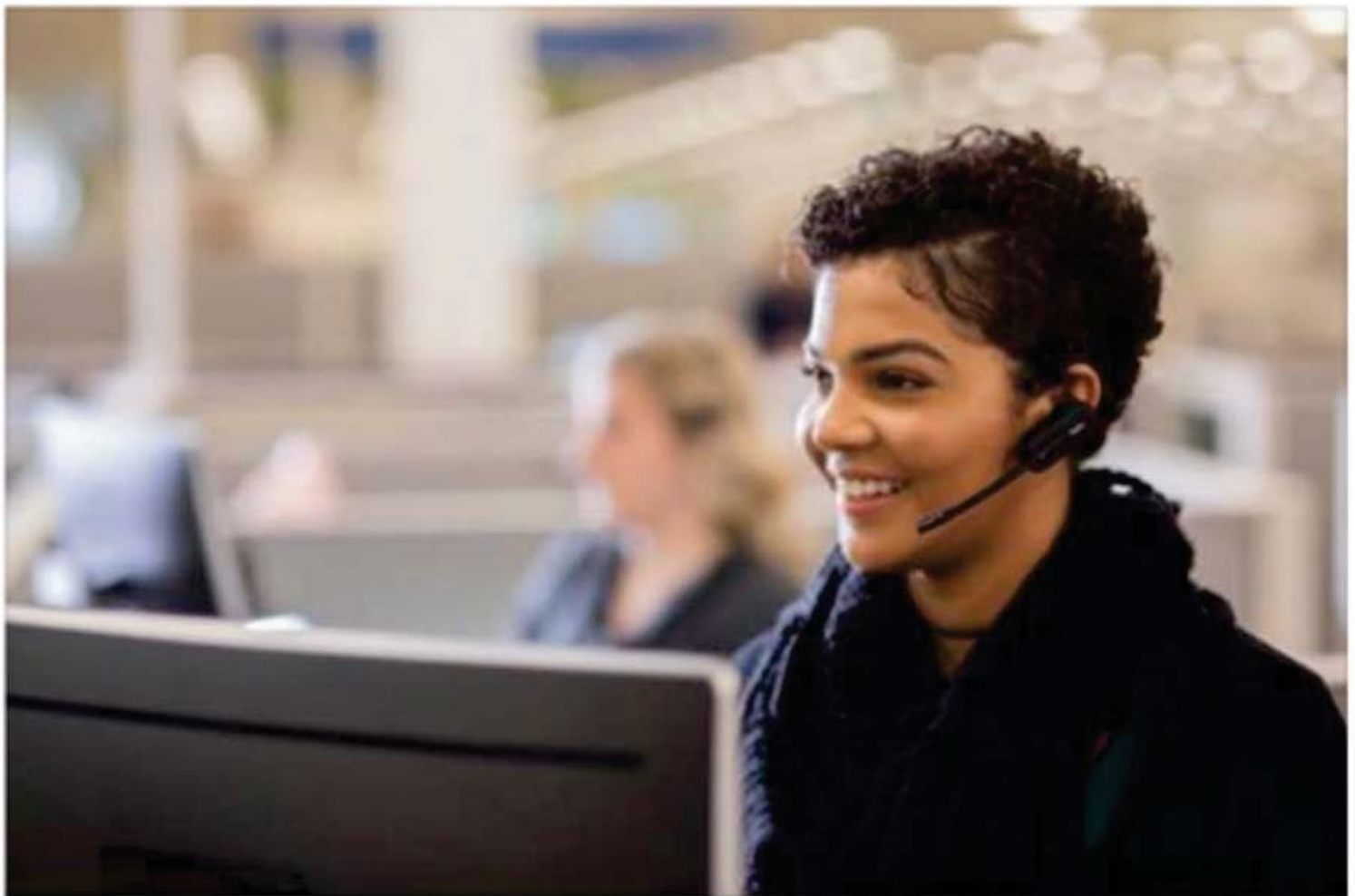


GM Financial



Published by Michael Landauer [?] · March 21 at 10:06am · 🌐

Have a question about your account? We answer private messages on Facebook from 7 a.m. to 6 p.m., Monday through Saturday. Send a private message with your name and ZIP code to get started. You might also want to check out these FAQs: <http://s.gm.financial/5re3f>



GM Financial

Loan Service



Send Message

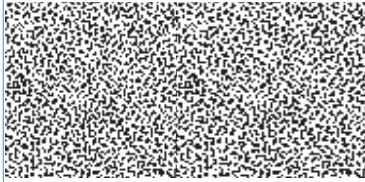
Exhibit H: Statements



MANAGE YOUR ACCOUNT ANYTIME AT GMFINANCIAL.COM/MYACCOUNT

PSRT
FIRST-CLASS MAIL
U.S. POSTAGE PAID
NCP

FORWARDING SERVICE REQUESTED



Single Window: 2 1/2" x 4"
From Left: 1/2"
From Bottom: 3/4"



GM FINANCIAL

GM FINANCIAL ACCOUNT STATEMENT
November 1, 2018

2016 TOYOTA

ACCOUNT NUMBER	CURRENT BALANCE*
PAYMENT PROGRESS	23 payments to go

Go Paperless.

Log In or Register at:
gmfinancial.com/myaccount
applnd=N, Make=TOYOTA

*CURRENT BALANCE ABOVE DOES NOT REFLECT THE
PAYOFF AMOUNT FOR YOUR ACCOUNT. PLEASE SEE
REVERSE SIDE FOR DETAILS.

Total Amount Due:

Payment Due Date:

November 21, 2018

Transaction Summary

DATE	ACTIVITY	AMOUNT
06/22/2016	FEE ASSESSMENT	
Late Charges	Total of any late charges in this bill cycle, if applicable.	
Past Due	Includes any payments, fees, and late charges, if applicable.	
Current Due	Includes any payments and fees in this bill cycle, if applicable.	

Your safety is very important to us.

To determine whether or not there is a recall on your current vehicle or on a vehicle you are considering, visit:

<https://vinrcl.safercar.gov/vin>

Payment Methods

For complete payment options, see reverse side.



Automatic Payments

Set up automatic withdrawals from your bank account at gmfinancial.com/myaccount



Online Bill Payment*

Pay your bill online now at gmfinancial.com/myaccount

*A Western Union fee may be assessed



Pay By Phone*

Pay securely by phone. See reverse side for complete details.

*A Western Union fee may be assessed

Contact Customer Service at 1-877-203-5517

or TTY Access (888) 998-0253 (requires TTY capable device)

GM Financial Mobile™
HAS ARRIVED

Download our app for convenient, secure access anytime, anywhere.

Available now for Android™. iOS version coming soon.

GET IT ON Google Play SEARCH FOR GM FINANCIAL

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PAYMENT COUPON - PLEASE INCLUDE WITH PAYMENT

STMT_US



GM FINANCIAL

P.O. Box 183834 Arlington, TX 76096-3834

Payment Summary

Total Amount Due:

Payment Due Date:

November 21, 2018

Amount Enclosed:

\$

Account Number:

Check Information

✓ Fill out your check with your Account Number

✓ Make it payable to GM Financial

GM Financial

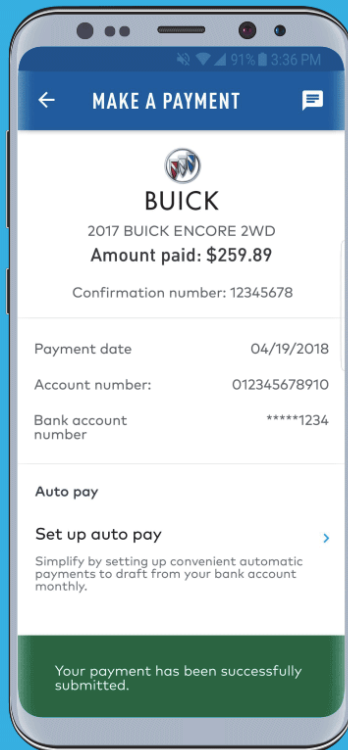
P.O. Box 78143
Phoenix, AZ 85062-8143

Exhibit I: Email



GM FINANCIAL

GM Financial MobileSM HAS ARRIVED



MAKE PAYMENTS &
SET UP AUTO PAY

MESSAGE OUR CUSTOMER
EXPERIENCE TEAM

SEE ACCOUNT
STATUS

ANSWERS TO FREQUENTLY
ASKED QUESTIONS

The GM Financial Mobile app is now available for Android™ users. An iOS version will be available soon.

LEARN MORE



[Apply for Credit](#) | [MyAccount](#) | [Privacy Policy](#) | [Unsubscribe](#) | <% if ((
recipient.InkAccounts.InkVehicle.vehicleMakeName == "CHEVROLET" ||
recipient.InkAccounts.InkVehicle.vehicleMakeName == "CHEVY")){ %> [Schedule Service](#) <% } else if (
recipient.InkAccounts.InkVehicle.vehicleMakeName == "BUICK"){ %> [Schedule Service](#) <% } else if (
recipient.InkAccounts.InkVehicle.vehicleMakeName == "GMC"){ %> [Schedule Service](#) <% } else if (
recipient.InkAccounts.InkVehicle.vehicleMakeName == "CADILLAC"){ %> [Schedule Service](#) <% } else {
%> [Contact Us](#) <% } %>

GM Financial, 801 Cherry St., Suite 3500, Fort Worth, TX 76102

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BE PREPARED FOR YOUR LEASE END.



IT'S TIME FOR A NEW JOURNEY

<%= recipient.firstName %>, it's never too early to start thinking about your next Cadillac experience. Navigate the road ahead with your <%= recipient.InkAccounts.InkVehicle.vehicleModelYear %> <%= recipient.InkAccounts.InkVehicle.vehicleMakeName %> <%= recipient.InkAccounts.InkVehicle.vehicleModelName %> by visiting our helpful online guide, exploring your options and reading our FAQs to make your lease-end transition remarkable.

GET STARTED >>



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LEASE END: START YOUR JOURNEY

Welcome to your lease-end journey

<%= recipient.firstName %>, as you enter the final year of your <%= recipient.InkAccounts.InkVehicle.vehicleModelYear %> <%= recipient.InkAccounts.InkVehicle.vehicleMakeName %> <%= recipient.InkAccounts.InkVehicle.vehicleModelName %> lease, we want to help you prepare and understand the process every step of the way. Visit our helpful online guide, explore your options and read our FAQs to make your lease-end transition remarkable.

GET STARTED



[Apply for Credit](#) | [MyAccount](#) | [Contact Us](#) | [Privacy Policy](#) | [Unsubscribe](#)

GM Financial, 801 Cherry St., Suite 3500, Fort Worth, TX 76102

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NEWSLETTER



In April, we celebrate Financial Literacy Month and give you the tools you need to boost your money skills.

[UNLOCK YOUR FUTURE](#)

It's hard to give advice to someone who already knows it all, but here are a few money tips to set your teen up for financial success.

[START 'EM EARLY](#)

There are pros and cons to adding another credit card to your wallet.

[WHAT'S RIGHT FOR ME?](#)

Got a money question? Follow us on Facebook to find answers and learn more about budgeting, credit and money management.

[FOLLOW US](#)

Like this email?
Tell us how we can provide the articles that matter most to you.

[TAKE A 5-MINUTE SURVEY](#)

Apply for Credit | MyAccount | Privacy Policy | Unsubscribe | <% if ((recipient.InkAccounts.InkVehicle.vehicleMakeName == "CHEVROLET") || recipient.InkAccounts.InkVehicle.vehicleMakeName == "CHEVY") { %> [Schedule Service](#) <% } else if (recipient.InkAccounts.InkVehicle.vehicleMakeName == "BUICK") { %> [Schedule Service](#) <% } else if (recipient.InkAccounts.InkVehicle.vehicleMakeName == "GMC") { %> [Schedule Service](#) <% } else if (recipient.InkAccounts.InkVehicle.vehicleMakeName == "CADILLAC") { %> [Schedule Service](#) <% } else (%> [Contact Us](#) <%) %>

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